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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Request for Additional Funds for the Shaffer
Equipment Company Site, Fayette County,
Minden, West Virginia

DATE: FEB 15 1985

FROM: Robert E. Caron, OSC *[Signature]*
Emergency Response Section (3HW22)

TO: Stanley L. Laskowski
Acting Regional Administrator (3RA00) *[Signature]*

THRU: Stephen R. Wassersug, Director *[Signature]*
Hazardous Waste Management Division (3HW00)

Issue

Additional funds are necessary to complete corrective actions designed to eliminate the direct contact and off-site migration threats at the Shaffer Equipment Company Site, Minden, W.V. Funds will be used for additional site stabilization and disposal of hazardous substances.

Background

The initial request for immediate removal funds was approved on December 26, 1984. Funds were requested and approved for three of the four phases originally proposed. These three phases are as follows:

Phase I - Initial Containment, Control and Stabilize, Maintain Containment

Phase II - Measuring and Sampling

Phase III - Disposal Feasibility Study

Verbal and written notice was given to two potential responsible parties, Shaffer Equipment Company and the Berwind Land Corporation. Both parties have declined to undertake any cleanup activity and have verbally agreed to allow EPA to undertake corrective actions unhindered.

Discussion

On-site work commenced on December 28, 1984. Phases I and II are essentially complete. Phase III, the Disposal Feasibility Study is only partially complete due to the reasons explained below.

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Phase II, the measuring and sampling plan indicates that there is an estimated 2,000 cubic yards of PCB contamination from 50 ppm to 260,000 ppm. Three PCB transformers and 9 PCB capacitors were found on site, many in poor condition.

PCB has been shown to be migrating off site both mechanically (sediment carry) and in solution (024 ppm). Underflow dams, constructed to contain the oily runoff, have been effective in reducing the amount of off site migration, but have not eliminated off-site migration. PCB has been found in stream sediment at levels as high as 73 ppm (300 yards downstream). In addition, residential survey samples collected in floor zone areas indicate the presence of PCB at levels ranging from 11 - 15 ppm as far as one mile downstream. CDC has been consulted as regards these residential sample results. Preliminarily, it appears that there is no cause for immediate concern; however, these results indicate a need for more thorough sampling in the residential area. Further, the relatively high level encountered in the stream sediment (73 ppm) indicates that a potential exists for contamination in the residential areas (backyard) at a more significant level.

The OSC has determined that initial attempts to control and stabilize this site have been only marginally effective. The soil types and the close proximity of the stream, coupled with other related geologic factors, indicate that more thorough stabilization is necessary and an emergency situation still exists on site.

Options

A) No Action - No action will allow for the continued discharge of PCB to the stream. Flood events, not only enhance the discharge rate, but also allow for the spread of contamination directly to the residential area. The OSC has determined that this option is not acceptable as a significant threat to public health and the environment will continue to exist.

B) Containment Only - Although this is a potentially feasible option, this site is located in a flood prone area. In addition, the cost necessary to properly contain contaminants may be unreasonable. The OSC feels that due to geologic conditions found at this site, it is necessary to excavate and remove the contaminants from the flood prone area.

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C) Proposed Option - Due to the complete nature of this site, the proposed option includes an options analysis/feasibility study to be coordinated by the OSC and performed by ERT. In addition, the following items are proposed:

1) Transport and dispose of leaking, deteriorating PCB transformers and capacitors.

2) Reroute the PVC Waterline around the site to aid in ease of excavation and eliminate any potential for drinking water contamination.

3) Excavate, remove contaminated soils and stage in a safe and secure area. Properly backfill and otherwise restore the site.

4) Perform an option analysis and feasibility study as regards disposal and/or containment and/or stabilization options, tentatively to be considered will include but not be limited to:

- On site incineration
- Solvent washing soils
- Microencapsulation
- PCB detoxification in-situ
- Slurry wall/capping

It should be noted that the OSC proposes to excavate and remove contaminated soils from the flood plain area and place them in a secure area on another non flood plain area on site. Soil type and other geologic factors will not allow for in-situ containment that would result in a reasonable chance for success. The study proposed in item 4 will result in an additional funding request. The options and cost will be developed at the completion of this study.

Proposed Option and Budget

1) Transport and Dispose of Transformers and Capacitors	\$ 80,000 Estimated 7 days
2) Reroute Water Line	\$ 20,000 Estimated 14 days
3) Excavate, Remove, Stage Contaminated Soils and Backfill/Restore	\$400,000 Estimated 30 days
4) Option Analysis/Feasibility Study (ERT/EERU)	\$ 75,000 Estimated 60 days

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5) TAT	\$ 20,000
6) USCG/AST	<u>\$ 20,000</u>
Sub Total Extramural	\$615,000
Intramural EPA	<u>\$ 10,000</u>
Project Total	\$625,000
Funds Previously Approved	\$175,000
New Project Total	\$800,000

Enforcement

The OSC intends to issue a second notice to the property owners upon approval of this request. In addition, Enforcement and Regional Counsel are contemplating issuing a 106 Order to the Berwind Land Corporation who owns approximately 1/3 of the effected site (approximately 500 yards). It should be noted that previous notice given to Berwind Land Company was not effective in securing voluntary compliance.

Regional Recommendations

Because conditions at the Shaffer Equipment Company site meet the criteria as set forth in Section 300.65 of the National Contingency Plan, I recommend your approval of this additional immediate removal request.

The estimated additional project costs are \$625,000 of which \$615,000 are extramural cleanup contractor costs. This brings the total project costs to \$800,000, which includes the initial funding request of \$75,000, approved on December 26, 1984.

You may indicate your approval or disapproval by signing below:

Approval _____

Disapproval _____

Date **FEB 15 1985** _____

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